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May 29, 2020

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### **VIA ECF AND LAWYER'S SERVICE**

Honorable Juan R. Sánchez, U.S.D.J.  
U.S. District Court of the Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**RE: Xavier Ingram v. County of Camden, et al.**  
**Civil Action: 1:14-cv-05519-JRS**

Dear Chief Judge Sánchez:

This letter is submitted jointly on behalf of all counsel. First and foremost, all counsel wish to thank Your Honor for the extensive time and attention provided in reviewing the details and current status of this case during our initial conference on May 28, 2020. In follow up, all counsel participated in a meet and confer regarding the pending motions which includes Defendants' Motion to Bifurcate and the parties' respective Motions *In Limine*.

Collectively, we propose and respectfully request that the Court first address and decide the Motion to Bifurcate (D.E. 265-272). The reason for this is two-fold. Firstly, this motion is fully briefed, ready for oral argument and resolution. Moreover, this Court's decision on bifurcation will impact a number of the Motions *in Limine*. In other words, if this Court grants or denies bifurcation, then a number of the Motions *in Limine* may become moot or may be resolved by stipulation. If the Court is inclined to proceed in this manner, the parties request that a date be set down for oral argument on the Motion to Bifurcate, and that the Court Order that within 45 days of the Court's decision on the Motion to Bifurcate the parties file a stipulation resolving the pending Motions *In Limine* and file their opposition as to those pending Motions *in Limine* not resolved by stipulation. Replies would be due 14 days thereafter. Resolution of the Motion to Bifurcate, followed by resolution of the Motions *in Limine* will also help facilitate finalization of the Final Pre-Trial Order.

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If this proposal is not acceptable to the Court, then we propose that all parties file their oppositions to all Motions *In Limine* by July 15, 2020 and all replies shall be filed by July 29, 2020.

Finally, the parties respectfully seek guidance on the form of the Final Pre-Trial Order in light of the differences between Your Honor's Procedures and those of the New Jersey District Court. Over the past several months, counsel have had numerous in-person conferences and worked extensively on the Final Pre-Trial Order. This has been a very productive and valuable process which resulted in streamlining certain aspects of the case. In short, we seek to retain the benefit of our collective efforts to date while accommodating the specific requirements of Your Honor's Procedures. We look forward to working out these details in the course of our next conference with the Court.

We thank you for Your Honor's consideration.

Respectfully submitted,

*/s/Beth G. Baldinger*

BETH G. BALDINGER

CC: All Counsel of Record